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(Additional Counsel Listed on Signature Page)

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

2-WAY COMPUTING, INC.,

Plaintiff,

vs.

AT&T MOBILITY LLC and AT&T  
MOBILITY II LLC,

Defendants.

Case No. 2:15-cv-02230-GMN-(CWH)

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINE TO  
FILE PROPOSED PROTECTIVE  
ORDER**

**(Second Request)**

Plaintiff 2-Way Computing, Inc. ("2-Way") and Defendants AT&T Mobility LLC and  
AT&T Mobility II LLC (collectively, "ATTM") by and through their counsel, hereby file this

1 Stipulation and [Proposed] Order to Extend the Deadline to File Proposed Protective Order. This  
 2 request complies with Local Rules 6-1, 6-2, and 7-1. The litigation of this matter will be best  
 3 served by the proposed extension. This is the second request to extend this deadline. This  
 4 request is not made after the deadline.

5 On April 26, 2016, the Court entered the Discovery Plan and Scheduling Order in this  
 6 matter, ECF No. 44, setting April 27, 2016 as the deadline for the parties to file a proposed  
 7 protective order. On April 27, 2016, the parties submitted a stipulation for a two-week extension  
 8 of the proposed protective order deadline to May 11, 2016, ECF No. 45, which the Court  
 9 approved on April 28, 2016, ECF No. 46. The parties have made substantial progress toward an  
 10 agreed protective order during that two-week period, but agree that an additional one-week  
 11 extension, to May 18, 2016, will permit the parties time to resolve a few remaining issues so that  
 12 the parties can present a minimal number of disputes, if any, regarding the proposed protective  
 13 order to the Court.

14 Accordingly, Plaintiff and Defendants respectfully request that the Court grant this request  
 15 to continue the deadline to file a proposed protective order.

16 DATED: May 11, 2016

17 Respectfully submitted,

18 **RUSS, AUGUST & KABAT**

**KILPATRICK TOWNSEND &  
STOCKTON LLP**

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 21 Reza Mirzaie, Esq.  
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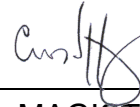
***Counsel for Defendants***

*AT&T Mobility LLC and AT&T Mobility II LLC*

**ORDER**

IT IS SO ORDERED.

DATED May 12, 2016



U.S. MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO FILE PROPOSED PROTECTIVE ORDER** by the method indicated:

_____	U.S. Mail
_____	U.S. Certified Mail
_____	Facsimile Transmission
_____	Overnight Mail
_____	Federal Express
_____	Hand Delivery
<u>      X      </u>	Electronic Filing/ECF

and addressed to the following:

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DATED: May 11, 2016

/s/ Laura Mullendore  
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